

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, DC 20268-0001

Periodic Reporting
(Proposal Ten)

Docket No. RM2020-2

PUBLIC REPRESENTATIVE MOTION
FOR ISSUANCE OF INFORMATION REQUEST 2

(December 23, 2019)

Pursuant to 39 C.F.R. § 3001.21(a) and 39 C.F.R. § 3007.3(c), the Public Representative (PR) requests that an Information Request be issued to obtain additional clarifying data and information from the Postal Service concerning the proposed changes to analytical methods for calculating the variability of Postmaster costs, labeled as Proposal Ten.¹ The proposed questions seek information that will allow participants to provide comments that are more constructive and evaluate whether the proposal meets the applicable legal and regulatory requirements. Obtaining this information will also contribute to a better understanding of how the Postal Service has interpreted Commission rules and allow the Commission to make a fully informed, reasoned determination on whether Proposal Ten meets applicable legal and regulatory requirements, including 39 U.S.C. § 3652(e)(2) and 39 C.F.R. part 3050.

¹ Petition of the United States Postal Service for the Initiation of a Proceeding to Consider Proposed Changes in Analytical Principles (Proposal Ten), November 29, 2019. (Petition).

Proposed Questions

The following questions seek information regarding Postal Service practice regarding Zones of Tolerance. Please refer to the U.S. Postal Bulletin, Volume Number 104, Issue PB21393, March 3, 1983, at 22, which states that “[t]he encumbered office will not change grade unless ... (2) the WSCs fall within the Zone of Tolerance for the current grade and have *consistently remained within the Zone* for two years (original italics).”²

1. Please explain the meaning of the term “consistently.” Please respond to the following questions in your answer.
 - a. How many months (or other time period) must the WSCs of an encumbered Post Office remain within the Upper Zone of Tolerance in order for it to move to a higher EAS level?
 - b. How many months (or other time period) must the WSCs of an encumbered Post Office remain within the Lower Zone of Tolerance in order for it to move to a lower EAS level?
 - c. Does the time during which the WSCs of an encumbered Post Office remain within the Upper or Lower Zones of Tolerance need to be consecutive and if so how long, in order for it to move to a higher or lower EAS level?
 - d. Please explain the decision rule the Postal Service uses to determine whether it will move an encumbered Post Office in the Upper or Lower Zones of Tolerance to a higher or lower EAS level if its WSCs intermittently exceed or fall below the upper and lower zones of tolerance during the 2-year waiting period.
2. Please estimate of the number of encumbered Post Offices by originating EAS level in:
 - a. 2015 that remained at their 2015 EAS level during 2017.
 - b. 2016 that remained at their 2016 EAS level during 2018.
 - c. 2017 that remained at their 2017 EAS level during 2019.

² To obtain this Postal Bulletin, insert this link into a browser address bar: <http://www.uspostalbulletins.com/pdfsearch.aspx?pid=1&Group=48&id=48#y1983>. Then, go to number (2) in the “Filters” select the radio button entitled “Specific Date,” enter 03/03/1984, and click the button entitled “Full Search Using All Ticked Filters.” Then click the results to obtain this Postal Bulletin.

3. Please estimate of the percentage of encumbered Post Offices by originating EAS level in:
- a. 2015 that remained at their 2015 EAS level during 2017.
 - b. 2016 that remained at their 2016 EAS level during 2018.
 - c. 2017 that remained at their 2017 EAS level during 2019.

Respectfully submitted,

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